

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRUSTEES OF THE BRICKLAYERS
AND ALLIED CRAFTSMEN LOCAL 56
FRINGE BENEFIT FUND,

Plaintiffs,

V.

A-TECH STUCCO EIFS CO.,
AN ILLINOIS CORPORATION, AND
JOHN BAGJAS, INDIVIDUALLY,

Defendant.

Case No. 08 C 2245

Judge Lefkow

Magistrate Judge Ashman

NOTICE OF MOTION

TO: A-Tech Stucco Eifs Co.
c/o its Registered Agent,
Michael T. Nigro
1793 Bloomington Road
Glendale Heights, IL 60139

John Bagjas
29W160 Calumet Avenue
Warrenville, IL 60555

PLEASE TAKE NOTICE that on **June 17, 2008**, at **9:30 a.m.** or as soon hereafter as Counsel may be heard, I shall appear before the **Honorable Judge Lefkow, Room 1925** in the Courtroom usually occupied by her in the Federal District Court, 219 S. Dearborn Street, Chicago, Illinois, and then and there move and present the attached Motion for Order of Default and Judgment In Sum Certain.

**TRUSTEES OF BRICKLAYERS AND ALLIED
CRAFTSMEN LOCAL 56 FRINGE BENEFIT
FUND**

s/ Donald D. Schwartz
One of their Attorneys

Donald D. Schwartz
ARNOLD AND KADJAN
19 W. Jackson Blvd., Suite 300
Chicago, IL 60604
312-236-0415 (phone)
312-341-0438 (fax)
Dated: June 11, 2008

PROOF OF SERVICE

I hereby certify that I electronically filed this Notice of Motion and Motion for Order of Default and Judgment In Sum Certain with the Clerk of the Court and a copy will be sent to the above-mentioned at the above-mentioned address and depositing the same, in the U.S. Mail at Jackson & Dearborn, Chicago, Illinois on the 11th day of June 2008, at or before the hour of 5:00 p.m.

A-Tech Stucco Eifs Co.
c/o its Registered Agent,
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